

TO: Clerk's Office  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

\*\*\*\*\*  
In the matter of an unsealing order

24-MC-2678  
Docket Number

\*\*\*\*\*

SUBMITTED BY: Plaintiff \_\_\_ Defendant \_\_\_ DOJ ☒  
Name: Erin Reid  
Firm Name: USAO-EDNY  
Address: \_\_\_\_\_  
271 Cadman Plaza East, Brooklyn, NY 11201  
Phone Number: 718-254-6361  
E-Mail Address: erinmaw@gmail.com

INDICATE UPON THE PUBLIC DOCKET SHEET: YES \_\_\_ NO ☒  
If yes, state description of document to be entered on docket sheet:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**MANDATORY CERTIFICATION OF SERVICE:**

A.) \_\_\_ A copy of this application either has been or will be promptly served upon all parties to this action, B.) \_\_\_ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or C.) ☒ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

July 8, 2024  
DATE

*Erin Reid*  
SIGNATURE

**A) If pursuant to a prior Court Order:**

Docket Number of Case in Which Entered: \_\_\_\_\_  
Judge/Magistrate Judge: \_\_\_\_\_  
Date Entered: \_\_\_\_\_

**B) If a new application,** the statute, regulation, or other legal basis that authorizes filing under seal

Ongoing criminal investigation: \_\_\_\_\_

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.**

DATED: Brooklyn, NEW YORK  
7/8/2024 s/ James R. Cho

**U.S. MAGISTRATE JUDGE**

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_  
DATE

EMR

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

IN RE: UNSEALING OF RECORDS  
RELATING TO QUEENS SUPREME  
CRIMINAL COURT CASES  
ASSOCIATED WITH DOCKET  
NUMBERS 72015-2024 AND  
72197-2024

-----X

FILED UNDER SEAL

EX PARTE AFFIRMATION AND  
APPLICATION

24-MC-2678

Erin Reid, pursuant to Title 28, United States Code, Section 1746, hereby declares  
under penalty of perjury:

1. I am an Assistant United States Attorney in the office of Breon Peace, United States Attorney for the Eastern District of New York. I am a federal prosecutor in charge of a federal investigation associated with two individuals, JUNG KIM and YERIM YOON. I am informed that the Queens County District Attorney's Office ("QCDA") has open criminal cases against KIM and YOON in connection with criminal docket numbers 72015-2024 and 72197-2024. I make this Affirmation and Application, pursuant to the All Writs Act, Title 28, United States Code, Section 1651, for an order to unseal and obtain grand jury testimony and records and any search warrants relating to KIM and YOON maintained by QCDA.

2. This Office is investigating charges relating to KIM, YOON, and others, known and unknown, for violations of Title 18, United States Code, Section 2242(b) (coercion and enticement of a minor), and related crimes. The files maintained by QCDA relating to KIM and YOON are believed to contain information relevant to the pending investigation.

3. I have been informed by QCDA that grand jury testimony, returns and search

warrants will not be disclosed without an unsealing order.

4. Accordingly, I make this Affirmation for an order to unseal the records described herein solely for the purpose of the federal investigation. This request is being made, *inter alia*, so that the United States Attorney's Office, pursuant to its obligations under the Federal Rules of Evidence, the Federal Rules of Criminal Procedure, Title 18, United States Code, Section 3500, as well as Brady v. Maryland, 373 U.S. 83 (1963), Giglio v. United States, 405 U.S. 150 (1972), and their progeny, can produce any appropriate statements or evidence in this prosecution and comply with its obligations.

5. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and any subsequent order. Sealing this document is necessary because the information sought is relevant to an ongoing investigation into the offenses described above, which investigation is not known to the targets of the investigation. Accordingly, premature disclosure of this application and any subsequent order may have a significant and negative impact on the continuing investigation and may seriously jeopardize its effectiveness.

WHEREFORE, it is respectfully requested that the Court grant this Application for an Order to unseal and obtain from QCDA the files listed above and outlined herein.



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Erin Reid  
Assistant U.S. Attorney  
(718) 254-6361

Dated: Brooklyn, New York  
July 8, 2024

EMR

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IN RE: UNSEALING OF RECORDS  
RELATING TO QUEENS SUPREME  
CRIMINAL COURT CASES  
ASSOCIATED WITH DOCKET  
NUMBERS 72015-2024 AND  
72197-2024

-----X

FILED UNDER SEAL

EX PARTE AFFIRMATION AND  
APPLICATION

24-MC-2678

Upon the annexed Affirmation and Application of the United States Attorney for the Eastern District of New York, by Assistant United States Attorney Erin Reid, pursuant to the All Writs Act, Title 28, United States Code, Section 1651, requesting that an Order be issued to unseal and obtain grand jury testimony and records and any search warrants relating to JUNG KIM and YERIM YOON and criminal docket numbers 72015-2024 and 72197-2024 maintained by the Queens County District Attorney's Office ("QCDA") and to permit the United States Attorney's Office to review those documents,

IT IS HEREBY ORDERED that the QCDA documents relating to the individuals and docket numbers described above be unsealed to permit the United States Attorney's Office to review the contents of the testimony and other related materials.

IT IS FURTHER ORDERED that the application and this Order are sealed until otherwise ordered by the Court.

Dated: Brooklyn, New York  
July 8, 2024

s/ James R. Cho  
\_\_\_\_\_  
HONORABLE JAMES R. CHO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK